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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

~~DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION~~

DP BARCODE No.: D439280; FILE SYMBOL No.: 46197-E; DECISION No.: 527182; PC Code(s): 109701;
PRODUCT NAME: Anti Mosquito Paint; ACTION CODE: R260; FOOD Use: No

DATE OUT: February 28, 2018

SUBJECT: End Use Product Chemistry Review
Product Name: Anti Mosquito Paint

FROM: Akiva Abramovitch, Ph.D.
CITAB / RD (7505P)

THROUGH: Shyam Mathur, Ph.D.
Product Chemistry Team Leader
CITAB /RD (7505P)

TO: Jennifer Gaines/ RM 04;
I-V Branch 1 / RD (7505P)

COMPANY: Kansai Paint
MRID: 501929-01 and -02

INTRODUCTION:

The registrant has submitted an application for the registration of the new Anti-Mosquito Paint end use product. The registrant has submitted CSF's for basic formulation dated March 24, 2017 and for alternate CSFs 1-3 also dated March 24, 2017 and alternate CSFs 4 and 5 dated August 22, 2017. The registrant has submitted group A & group B product chemistry data with MRID No. 501929-01 and -02. CITAB has been asked to determine the acceptability of the proposed basic CSF and the alternate CSF's, the supporting cited product chemistry data.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Permethrin (1.0%)
2. Has the registrant claimed substantial similarity to a registered product?
☐ Yes; ☒ No; ☐ NA; if yes give the registration number of the cited product.
3. All of the source materials of the active ingredient are derived from registered sources- ☒ Yes ☐ No
4. All inert ingredients have been screened by CITAB (Inert group) and found to be approved for the proposed labeled uses.
5. Confidential Statement of Formula(s):

☒ Basic - Dated: March 24, 2017

Re-submitted - Dated:

☒ Alternate CSF 1-3 dated: March 24, 2017 and alternate CSFs 4 and 5 dated August 22, 2017

Alternate CSF(s) complies with 40CFR§152.43: ☒ Yes; ☐ No; ☐ NA

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6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2).

☒ Yes; ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent: ☐ Yes ☒ NA
Soluble arsenic: ☐ Yes ☒ NA
Isomeric ratios: ☐ Yes ☒ NA
Acid Equivalent: ☐ Yes ☒ NA; acid equivalent =

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes ☒ No ☐ NA
Methanol at > 4%: ☐ Yes ☒ No ☐ NA
Sodium nitrate/Sodium nitrite ☐ Yes ☒ No ☐ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☐ Yes; ☒ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement:

☐ Yes; ☒ No; if yes explain below:

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7. Group A: Product Chemistry Data cited from Reg. No. 39967-53

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos. Cited
			Yes	No		
830.1550	Product Identity & Composition		X		A	501929-01
830.1600	Description of materials used to produce the product		X		A	501929-01
830.1650	Description of formulation process		X		A	501929-01
830.1670	Discussion on the formation of impurities		X		A	501929-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	501929-01
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	501929-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group B: Product chemistry data cited

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos. CITED
830.6303	Physical State	White liquid with a low polymeric odor	A	501929-02
830.6315	Flammability	Not flammable	W	501929-02
830.6316	Explodability	Neither TGAI or the inert ingredients are considered as potentially explosive	W	501929-02
830.7000	pH	8.94 at 25°C (1% w/w)	A	501929-02
830.7300	Density (units)	1.338 g/ml (10.43-11.68 lbs/gal) at 25°C	A	501929-02
830.7100	Viscosity	7-9 m Pas at 20°C	A	501929-02
830.6317	Storage stability	A one year study is in progress.	G	
830.6320	Corrosion characteristics	A one year study is in progress.	G	
830.6314	Oxidation/reduction	This product is compatible with oxidizing or reducing agents.	A	501929-02

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CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted for the end-use product and has concluded that:

A. Substantial similarity to the cited product (Reg. No.) from Product chemistry view point

- ☐ Similar
- ☐ Not similar, give reasons:
- ☐ Identical
- ☐ Not identical
- ☒ Not applicable

B. Confidential Statement of formula

1. Basic CSF (dated March 24, 2017)
☒ Acceptable
☐ Not Acceptable:
☐ Not Applicable
2. Alternate CSF #1-3 March 24, 2017 and 4, 5 dated August 22, 2017
☒ Acceptable
☐ Not Acceptable:
☐ Not Applicable

C. Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Acceptable with the exception of
- ☐ Not acceptable
- ☐ Not required
- ☐ Data cited

D. Group B Product chemistry data

- ☐ Acceptable
- ☐ Not acceptable
- ☒ Acceptable with the exception of the guidelines: 830.6317& 6320 storage stability and corrosion.
- ☐ Not required
- ☐ Data cited

E. Product Label/Draft Label

Recommendations – Yes ☐; No ☒